

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MICHELLE BEEBE,

Plaintiff,

v.

WILLIAMS COLLEGE,

Defendant.

Civil Action No. 05-30182

**INITIAL DISCLOSURES PURSUANT TO LOCAL RULE 26.2(A)  
AND FED. R. CIV. P. 26(A)(1)**

Pursuant to Local Rule 26.2(A) and Fed. R. Civ. P. 26(a)(1), Defendant Williams College ("Williams") makes the following initial disclosures with respect to the corresponding subparts of Fed. R. Civ. P. 26(a)(1):

(A) The persons known or believed to have discoverable information relevant to disputed facts alleged in the pleadings, based upon the information reasonably available to Williams and its attorneys at this time, are the following:

- Michelle Beebe  
509 North Houghton Street  
Clarksburg, MA 01247

Subjects: Plaintiff's claims.

- Marc Field  
Custodian  
Service Building  
Williams College  
60 Latham Street  
Williamstown, MA 02167  
(413) 597-2293

Subjects: Plaintiff's termination and grievance.

- Michael L. Gerrity, M.D.  
Ambulatory Care Center  
77 Hospital Avenue, Suite 102  
North Adams, MA 01247  
(413) 663-8365

Subjects: Medical condition of Plaintiff's children.

- Carol Luscier  
Snack Bar Manager  
Droppers House  
Williams College  
15 Park Street  
Williamstown, MA 01267  
(413) 597-3487

Subject: Plaintiff's attendance.

- Kris Maloney  
Benefits Administrator  
B&L Building  
Williams College  
100 Spring Street, Suite 201  
Williamston, MA 01267  
(413) 597-4478

Subject: Williams' policies and Plaintiff's FMLA claim.

- Carol Marks  
Science Library Assistant  
Sawyer Library  
Williams College  
55 Sawyer Library Drive  
Williamstown, MA 01267  
(413) 597-4502

Subjects: Plaintiff's termination and grievance.

- Peter Mason  
Supervisor of Custodial Services  
Service Building

Williams College  
60 Latham Street  
Williamstown, MA 01267  
(413) 597-2293

Subjects: Plaintiff's attendance and termination.

- Beatrice Miles  
Director of Facilities Services  
Service Building  
Williams College  
60 Latham Street  
Williamstown, MA 01267  
(413) 597-3496

Subjects: Plaintiff's attendance, termination, and FMLA claim.

- Stephen Payne, M.D.  
Northern Berkshire Family Practice  
820 State Road  
North Adams, MA 01247  
(413) 664-4088

Subjects: Plaintiff's medical condition.

- Damon Reed  
Senior Development Officer  
Vogt House  
Williams College  
75 Park Street  
Williamstown, MA 01267  
(413) 597-4122

Subjects: Plaintiff's termination and grievance.

- Martha Tetrault  
Director of Human Resources  
B&L Building  
Williams College  
100 Spring Street, Suite 201  
Williamstown, MA 01267  
(413) 597-2058

Subjects: Williams' policies and Plaintiff's FMLA claim, termination and grievance.

(B) The documents described below constitute the documents within the scope of Fed. R. Civ. P. 26(a)(1)(B) that Williams is able to identify at this time. Copies of these documents are located at the B&L Building, Williams College, 100 Spring Street, Suite 201, Williamstown, MA 02167.

- Williams' employment policies and forms  
Location: Human Resources Department
- Plaintiff's personnel records  
Location: Human Resources Department
- Plaintiff's attendance and payroll records  
Location: Human Resources Department

(C) As Williams is a defendant in this action, Fed. R. Civ. P. 26(a)(1)(C) is not applicable.

(D) Williams is insured by United Educators for an amount that would be sufficient to cover an amount that Plaintiff could potentially recover.

Respectfully submitted,  
Williams College  
By its attorneys,

/s/ Patricia M. Higgins

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Judith A. Malone (BBO #316260)  
Patricia M. Higgins (BBO # 663318)  
EDWARDS ANGELL PALMER & DODGE LLP  
111 Huntington Avenue  
Boston, MA 02199-7613  
617.239.0100  
[jmalone@eapdlaw.com](mailto:jmalone@eapdlaw.com)  
[phiggins@eapdlaw.com](mailto:phiggins@eapdlaw.com)

Dated: August 30, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document has been filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Patricia M. Higgins